

# **Plaintiffs' Exhibit 97**

## **(Redacted)**

HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA, *et al.*, )  
Plaintiffs, )  
v. ) 1:23-cv-108 (LMB/JFA)  
GOOGLE LLC, )  
Defendant. )

**EXPERT REBUTTAL REPORT OF ADORIA LIM**



---

ADORIA LIM

February 13, 2024

HIGHLY CONFIDENTIAL

## B. MY DAMAGES ANALYSIS INCLUDES MULTIPLE FAA PURCHASE PATHWAYS

44. The FAAs purchased display ads from Google using various ad agencies.<sup>26</sup> Some of those ad agencies engaged other ad agencies, such as related entities (parent, subsidiary, or sister companies) or subcontractors, to execute the FAAs' ad purchases. I refer to the first group, with whom the FAAs contracted, as "prime ad agencies," and the second group as "sub ad agencies."

45. I identified FAAs in the RFP60 Data and TTD Data and then identified specific combinations of FAAs and ad agencies. The RFP60 Data include variables called

[REDACTED]

46. The RFP60 Data also include variables called

[REDACTED]

47. I refer to each unique combination of FAA, prime ad agency, and (as applicable) sub ad agency as an "FAA Purchase Pathway." For example, for DV360, USPS used Universal McCann as its prime ad agency, and Universal McCann used Matterkind (an affiliate owned by the same

---

<sup>26</sup> See, e.g., USAF-ADS-0000771835 (contract number FA300218D0008 between the Air Force and GSD&M); USAF-ADS-0000414286, at -286-322.

27

[REDACTED]

28

[REDACTED]

29

[REDACTED]

HIGHLY CONFIDENTIAL

parent entity, IPG) as a sub ad agency. The combination of “USPS | Universal McCann | Matterkind” is a unique FAA Purchase Pathway. The ad agencies listed in an FAA Purchase Pathway reflect the ad agencies involved, in one way or another, in assisting the FAA in purchasing advertising from Google.<sup>30</sup>

48. **Figure 8, Figure 9, and Figure 10** below summarize the FAA Purchase Pathways for DV360, Google Ads, and TTD, respectively, which I include in my damages analysis. I assign each FAA Purchase Pathway a “Short Name” and a “Reference Name” for ease of reference. I base the Short Name on the values in the Advertiser Identifier Variables, the values in the Ad Agency Identifier Variables, information from Google invoices, and information from ad agency invoices or other invoice data.<sup>31</sup>

49. The gray cells in **Figure 8** indicate values where I omit additional information for purposes of pathway identification because [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

<sup>30</sup> My use of the word “Purchase” in the defined term FAA Purchase Pathway refers to the FAAs’ purchase of advertising through AdX and does not indicate any particular financial arrangement or sequence of financial arrangements among an FAA and ad agencies.

<sup>31</sup> For FAA Purchase Pathways VA.1 and VA.2, the VA worked with both J. R. Reingold and DCG on different campaigns. [REDACTED]

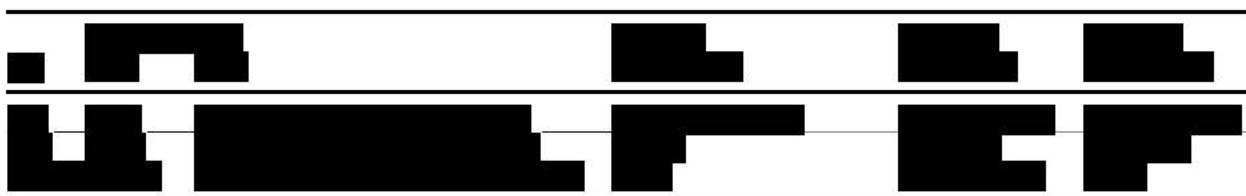
HIGHLY CONFIDENTIAL

Figure 8:



Sources:

Figure 9:



Source: XP Daily Monthly Data.

Figure 10: FAA Purchase Pathways through TTD Included in Damages Analysis



Sources:

50.

32